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February 11, 2025

## VIA ECF

Hon, Colleen McMahon Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

DOCUMENT ELECTRONIC, LLY FILED DATE FILED:

Re:

P.A., et. al. v. New York City Department of Education, et al.

24-cv-04544 (CM)(BCM)

Dear Judge McMahon:

Please be advised that this firm represents the Plaintiffs in the above action. Plaintiffs brought this action seeking enforcement of an underlying Order as well as attorneys' fees, costs and expenses for legal work on four trials under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. (IDEA), as well as for this action.

The parties submit this joint status report per the Court's December 27, 2024 Order (ECF 19) and respectfully request an additional 60-day stay of this action to allow the parties to continue settlement negotiations of attorney's fees and costs. The requested stay will allow the parties to hopefully resolve this matter without burdening the Court with motion practice. This is the parties' third request for a stay.

If the requested stay is granted, the parties proposes the submission of a joint status letter on or before April 22, 2025 updating the Court on the status of settlement negotiations.

We thank you in advance for the Court's consideration of this request.

Respectfully submitted,

Irina Roller

Attorneys for the Plaintiff

All counsel for Defendant via ECF cc: